

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA

NO. 3:23-CR-067-K

v.

STEPHEN PAUL BRINSON (05)
a.k.a. "Steve-O"

FACTUAL RESUME

In support of Stephen Paul Brinson's plea of guilty to the offense in Count One of the Superseding Indictment, Stephen Paul Brinson a.k.a. "Steve-O," the defendant, Paul Lund, the defendant's attorney, and the United States of America (the government) stipulate and agree to the following:

Elements of the Offense

To prove the offense alleged in Count One of the Superseding Indictment, charging a violation of 21 U.S.C. § 846, that is, conspiracy to possess with the intent to distribute a Schedule II controlled substance, the government must prove each of the following elements beyond a reasonable doubt:

First: That two or more persons, directly or indirectly, reached an agreement to possess with the intent to distribute and to distribute 40 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (fentanyl), a Schedule II controlled substance;

Second: That the defendant knew the unlawful purpose of the agreement; and

Third: That the defendant joined in the agreement willfully, that is, with the intent to further its unlawful purpose.

Stipulated Facts

Beginning in or about October 2022 and continuing until March 2023, in the Dallas Division of the Northern District of Texas, the Eastern District of Texas and elsewhere, the defendant, Stephen Paul Brinson, a.k.a. "Steve-O" and other persons both known and unknown to him, agreed to and engaged in the distribution of quantities of a mixture or substance containing a detectible amount of N-phenyl-N- [1- (2-phenylethyl) - 4-piperidinyl] propenamide (fentanyl), a Schedule II controlled substance.

Brinson admits that at certain times during the period the conspiracy was ongoing, he utilized a residence located at 2600 Asia Court, Flower Mound, Texas to store and distribute quantities of counterfeit round blue pills with "M30" imprinted on one side. These pills contained a fentanyl powder mix and are commonly referred to as "percs," "yerks" and "M30s" by customers who recreationally ingest the pills.

Brinson admits and acknowledges that during the period the conspiracy was ongoing, he distributed quantities of "M30" pills containing fentanyl to multiple customers in both the Northern and Eastern Districts of Texas. Brinson's customers included codefendant Donovan Jude Andrews and at least one juvenile that attended Hebron High School in Carrollton, Texas. Brinson admits that he utilized an Instagram Account ("superstarxs") and other instant messaging applications to discuss, negotiate and facilitate drug transactions with his customers. Brinson stipulates that during the period that the conspiracy was ongoing, the government can prove that he distributed approximately 1200 counterfeit pills containing a fentanyl powder mix to customers.

Brinson admits and acknowledges that on March 8, 2023, law enforcement

officers executed a search warrant at his parents' residence located at 2600 Asia Court, Flower Mound, Texas. Inside Brinson's bedroom, officers located approximately 1800 counterfeit pills ("M30s") containing a fentanyl powder mix, one pound of marijuana, multiple THC cartridges, multiple grams of cocaine, digital scales, and packaging material. Law enforcement officers also seized two firearms (one Sccy 9 mm handgun bearing serial number 228452 and one Meriden .38 caliber handgun) from a safe inside the residence that the defendant stipulates are subject to forfeiture.

The defendant further admits that at the time that the search warrant was executed, he was driving in his vehicle to deliver one "M30" pill containing fentanyl to a customer at a location in Flower Mound, Texas. The defendant admits that while traveling to meet with the customer, he was in possession of two firearms (one Ruger 5.56 caliber rifle bearing serial number 1850-15385 and one FN 5.7 caliber firearm bearing serial number 386433748) that the defendant stipulates are subject to forfeiture.

Brinson admits that the overall scope of the conspiracy exceeded 40 grams of a mixture or substance containing a detectible amount of N-phenyl-N- [1- (2-phenylethyl) - 4-piperidinyl] propenamide (fentanyl), a Schedule II controlled substance and Brinson stipulates that he personally distributed or possessed with intent to distribute a total of approximately 3000 counterfeit "M30" pills.

Brinson admits and acknowledges that beginning in or about October 2022 and continuing thereafter until March 8, 2023, in the Dallas Division of the Northern District of Texas, the Eastern District of Texas and elsewhere, he, and other coconspirators both named and not named in his superseding indictment did knowingly, intentionally and

unlawfully combine, conspire, confederate, and agree together, with each other and with other persons both known and unknown, to commit certain offenses against the United States, to-wit: to possess with the intent to distribute and to distribute 40 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N- [1- (2-phenylethyl) -4-piperidinyl] propenamide (fentanyl), a Schedule II controlled substance.

Brinson agrees that he committed all of the essential elements of the offense in Count One of the Superseding Indictment and that the offense(s) described occurred in the Northern District of Texas, and elsewhere. The defendant further admits he understands this factual resume is not intended to be a complete accounting of all the facts and events related to the offense charged in this case. The limited purpose of this statement of facts is to demonstrate that a factual basis exists to support the defendant's guilty plea to Count One of the Superseding Indictment.

NOTHING FURTHER ON THIS PAGE

AGREED TO AND STIPULATED on this 5th day of April,
2023.

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STEPHEN PAUL BRINSON

Defendant

4/5/23

Date

PAUL LUND

ATTORNEY FOR DEFENDANT

4/5/23

Date